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CONSUMER PRODUCT SAFETY COMMISSION

U.S. CONSUMER PRODUCT SAFETY COMMISSION
WASHINGTON, D.C. 20207

OCT 30 1974

MFR/PRVLBR NOTIFIED no objections
——No comments made
——Comments attached
——Excisions/Revisions
——Firm has not requested further notice
[illegible] 8/12/84

Mr. Howard Lickerman, President
Regal Rugs, Inc.
North Vernon, Indiana 47265

Dear Mr. Lickerman:

This is in response to your inquiry of July 10, 1974, concerning the use of retail shelf signs in displaying non-complying small carpets and rugs subject to the Standard for the Surface Flammability of Small Carpets and Rugs (DOC FF 2-72) and the rules and regulations under the Flammable Fabrics Act, particularly 16 CFR Section 302.18(b).

In our view the requirements of 16 CFR 302.18(b) relative to setting forth the information "FLAMMABLE - Read the Label" in certain advertisements of non-complying small carpets and rugs would not be applicable to non-deceptive shelf signs or display signs in retail stores which are merely designed to indicate the price or location of the products. These comments would only apply where the non-complying carpet or rug itself is displayed in immediate proximity to the sign and is conspicuously and prominently labeled with the statement "FLAMMABLE - Fails U. S. Department of Commerce Standard FF 2-70: Should not be used near sources of ignition," as specified in DOC 2-70 and 16 CFR 302.18(a).

Sincerely yours,

Michael A. Brown
General Counsel

ADVISORY OPINION

7/15
Will call back.

July 10, 1974

Mr. Harry Garber,
Assistant Director
Bureau of Compliance
Consumer Product Safety
Commission
Washington, D.C. 20207

Dear Mr. Garber:

The question posed this morning via phone was:

On a sign which now reads -

24"x36"	$9.00
27"x48"	14.00
Regular Lid	4.00

...is it necessary to include the words "flammable - read the label" on this sign?

The product under the sign is labeled with the terminology "flammable (fails U.S. Dept. of Commerce Std. DOC FF 2-70); should not be used near sources of ignition.".

We would appreciate hearing from you in order to clarify some of the confusion that has existed in this area.

Sincerely,

Howard Lickerman

Howard Lickerman,
President.
/b

cc: Mr. Noel Rubinton